

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

RE: KEITH E VENSON	)	Case No. 23 B 10360
MELISSA R YANCY-VENSON	)	
	)	Chapter 13
Debtor(s)	)	
	)	Judge: TIMOTHY A BARNES

**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN**

**COMES NOW** Thomas H. Hooper, Chapter 13 Trustee duly appointed to administer the instant case ("Trustee"), and hereby OBJECTS to confirmation of the Chapter 13 plan filed by Debtor(s), in advance of the confirmation hearing set for November 30, 2023 10:30 am, for the following:

The Trustee requests a market analysis for the Debtor's real estate. The liquidation analysis under 11 U.S.C. § 1325(a)(4) cannot be completed until this is resolved.

**WHEREFORE**, the Trustee prays the Court to enter an Order denying confirmation of the proposed Chapter 13 plan, and for such other and further relief as the Court may deem just and proper. In the alternative, the Trustee requests a hearing on the matter.

Dated: November 13, 2023

/s/ Thomas H. Hooper

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Thomas H. Hooper  
Chapter 13 Trustee  
55 E. Monroe St., Suite 3850  
Chicago, IL 60603  
(312) 294-5900

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**CERTIFICATE OF SERVICE**

I, Emily Baez, do hereby certify that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age; and that on the date indicated herein below, I served copies of the foregoing TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN by depositing a copy of the same in a postage-paid envelope with the United States Postal Service or by electronic means, as indicated.

LORRAINE M GREENBERG	(via CM/ECF)
<i>Attorney for Debtor</i>	

Patrick Layng	(via CM/ECF)
United States Trustee	

KEITH E VENSON	(via U.S. Postal Service)
22934 RIDGEWAY AVE	
RICHTON PARK, IL 60471	
<i>Debtor</i>	

Dated: November 13, 2023

/s/ Emily Baez

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Emily Baez  
Office of the Chapter 13 Trustee  
55 E. Monroe St., Suite 3850  
Chicago, IL 60603  
(312) 294-5900